

FACT SHEET

**FOR THE DRAFT POST-CLOSURE PERMIT
PREPARED FOR**

**CITGO Petroleum Refinery
Lake Charles Refinery**

**EPA ID# LAD008080530
Agency Interest #1250**

**4401 Hwy 108
Lake Charles, Louisiana
Calcasieu Parish**

**Permit Number LAD008080530-PC-2
PER20000002**

I. INTRODUCTION

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal and significant facts, legal, methodological and policy requirements of the proposed draft hazardous waste post-closure permit for CITGO Petroleum Corporation, EPA ID Number LAD008080530, Agency Interest Number 1250 located in Lake Charles, Calcasieu Parish, Louisiana.

The Louisiana Department of Environmental Quality (LDEQ) has prepared this proposed Draft Hazardous Waste Permit for Post-Closure which addresses the requirements of LAC Title 33, Part V, Subpart 1 and the Federal Resource Conservation and Recovery Act (RCRA) as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA).

CITGO Petroleum Corporation is seeking a hazardous waste permit governing the post-closure care requirements for the Retention/Neutralization Basin and Holding Basin 1 at the Lake Charles Refinery.

A. THE PERMITTING PROCESS

The purpose of this fact sheet is to initiate the permitting decision process. The LDEQ's Waste Permits Division is required to prepare this Draft Hazardous Waste Permit. The Draft Hazardous Waste Permit sets forth all the applicable conditions, which the permittee is required to comply with during the life of the permit. CITGO Petroleum Corporation submitted its RCRA Post-Closure Permit Application for the Retention/Neutralization Basins and Holding Basin 1 in December, 2000.

The permitting process will afford the LDEQ, interested citizens, and other agencies the opportunity to evaluate the ability of the permittee to comply with the requirements of the LAC 33:V, Subpart 1 and the Hazardous and Solid Waste Amendments (HSWA) portion.

The public is given a minimum of forty-five (45) days to review and comment on the Draft Post-Closure Permit. The Administrative Authority, prior to making a decision or taking any final action on the draft permit, will consider all significant comments. The decision of the Administrative Authority shall be to issue, deny, modify, or revoke the Draft Post-Closure Permit in accordance with LAC 33:V.705.

B. NEW DRAFT HAZARDOUS WASTE PERMIT

The Waste Permits Division reviewed the permit application and other pertinent technical information, and prepared a draft permit that contains the language that pertains to the post-closure care of the Retention/Neutralization Basins and Holding Basin 1.

This draft hazardous waste permit is a tentative determination and is not the final decision of the Administrative Authority.

C. PUBLIC COMMENT PERIOD

LAC 33:V.715 requires that the public be given at least forty-five (45) days to comment on a draft permit decision.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. Any person interested in commenting on the draft permit for the CITGO Petroleum Corporation Lake Charles Refinery must do so within the allotted forty-five (45) day comment period.

Public notice of the proposed permitting action shall be published in specified newspapers, announced on the designated radio station, and mailed to those persons contained on the facility's mailing list.

A public hearing for the draft permit will be held only if requested in writing. The date, location and time would be provided in separate public notice. LDEQ will hold the hearing at least forty-five (45) days after the date on which the public notice is given.

D. LOCATIONS OF AVAILABLE INFORMATION

The administrative record, including all supporting documents is on file at the LDEQ Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, Louisiana. These documents may be inspected and copied (at \$0.25 per copy page) at any time between the hours of 8:00 to 4:30 p.m., Monday through Friday (except holidays).

In addition, a copy of the Draft Post-Closure Permit, fact sheet, and supporting documents are available for review at both the Calcasieu Parish Library, Sulphur Regional Branch, 1160 Cypress Street, Sulphur, LA and the Calcasieu Parish Library, 301 W. Claude Street, Lake Charles, LA.

WRITTEN COMMENT SUBMISSION

Interested persons may submit written comments on the Draft Post-Closure Permit to the Administrative Authority, at the address listed below, on or before the closing date of the comment period. All comments should include:

- (1) the name and address of the commenter,
- (2) a concise statement of the exact basis for any comment and supporting relevant facts, upon which the comment is based,
- (3) identification of the facility commented on (the EPA Identification Number and the AI number), and
- (4) supporting relevant facts upon which the comments are based.

All comments, further requests for information (including copies of this decision and fact sheet) and any requests by public interest groups or individuals who would like to be included in the mailing list, should be made in writing to

Ms. Soumaya Ghosn
Louisiana Department of Environmental Quality
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
(225) 219-3276 or fax (225) 219-3309

Any technical questions regarding this draft permit should be addressed to:

Ms. Amy Exnicios
Louisiana Department of Environmental Quality
Office of Environmental Services
Waste Permits Division
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313
(225) 219-0029 or fax (225) 219-3158

II. DESCRIPTION OF OVERALL SITE

CITGO Petroleum Corporation is the owner and operator of the Lake Charles Refinery located in Lake Charles, LA. The CITGO complex includes the Petroleum Refinery and the Cit-Con Lube Plant. Operations at the complex consist of the refining of crude oil and intermediate products to produce petroleum products, lube oil, waxes, and petrochemicals.

III. HAZARDOUS WASTE FACILITIES

The Lake Charles Refinery has three surface impoundments that are currently closed: the closed Retention/Neutralization Basins and Holding Basin 1. All wastes addressed in the draft permit were generated on site.

The Neutralization Basin was operational from 1972 until 1988. During operation the Neutralization Basin collected waste water from the Lube Plant Process Water Run-Off Sewer System and discharged into the Lube Plant Retention Basin. Upon closure there were no waste present in the unit. The Neutralization Basin was certified closed on January 23, 1997 and was closed under the same cap as the Retention Basin.

The Retention Basin was operational from 1972 until 1988. During operation the Retention Basin collected waste water from the Lube Plant Neutralization Basin and discharged into the Lube Plant Oily Waste Sewer System. Upon closure the Retention Basin contained approximately 15,000 cubic yards of solidified waste. The Retention Basin was certified closed on January 23, 1997 and was closed under the same cap as the Neutralization Basin.

Holding Basin 1 was operational from 1949 until 1994. During operation Holding Basin 1 collected waste water from the Lube Plant Storm Water Sewer System and the Lube Plants Clay Ponds 1, 2, & 4. Floating materials were skimmed off the northeast portion of the basin and sent to the Lube Plant Hydrovac unit. Waste water from the basin was discharged to the Lube Plant Interconnecting Channel through a weir at a rate of approximately 850 gallons per minute. Upon closer Holding Basin 1 contained 29,000 cubic yards of solidified sludge and contaminated soil. Holding Basin 1 was certified closed on March 1, 1999.

IV. FINANCIAL AND LIABILITY REQUIREMENTS

CITGO Petroleum Corporation has submitted documentation to satisfy the financial assurance and liability requirements of LAC 33:V. Chapter 37.

V. SUMMARY OF ENVIRONMENTAL FACTORS CONSIDERED

Pursuant to La.R.S.30:2018.E.3, this draft hazardous waste post-closure permit is not subject to the requirements regarding environmental assessment statements or IT analysis (Save Ourselves v. La. Env'tl. Control Comm'n, 452 So. 2d 1152, 1159 La. 1984). Nevertheless, the LDEQ has considered

factors similar to the IT analysis in preparing this draft permit. This is a preliminary analysis based on information currently available to the LDEQ.

A. The potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible.

The units addressed by this application are closed and are undergoing post-closure care. All aspects of the closure of the units and the post-closure care are in compliance with State and Federal regulations. As detailed below, the design of the post-closure units and the post-closure care requirements for the units are adequate to avoid the potential and real adverse environmental impacts to the maximum extent possible.

Three units are addressed by this application. The units are no longer operational; having been closed according to the closure plans approved by the Administrative Authority, and are undergoing post-closure care. There will be no further hazardous waste management activities associated with the units. There are, however, petroleum refinery wastes closed in place in the units.

During the closure of the surface impoundments, the wastes were stabilized using EPA approved methods. The units are covered by an engineered cap and a vegetative cover that is regularly inspected and maintained. These controls minimize the possibility of release into the air or surface and subsurface waters.

To address the possibility of release, groundwater monitoring programs for the units are a part of the post-closure care requirements. All of the hazardous constituents listed in the permit are tested for in the post-closure monitoring programs. If a release was detected and corroborated, then a corrective action program would be implemented to treat or to remove the contaminants. This program will be in place for thirty years from the date of the closure of the units with provisions that allow the Administrative Authority to lengthen or shorten the post-closure care period should conditions warrant such an action.

B. A cost benefit analysis of the environmental impact balanced against the social and economic benefits of the project demonstrates that the social and economic benefits outweigh environmental impacts.

There is no immediate environmental impact cost associated with the post-closure units addressed in this permit. The post-closure care program would mitigate any potential environmental impact. Because this permit addresses existing closed units there will be neither positive nor negative economic effects associated with this application. Since there are no environmental impact costs associated with this application, there is no need to offset such costs.

C. There are no alternative projects or alternative sites or mitigating measures which offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.

1. ALTERNATIVE PROJECTS

This draft permit is for the post-closure of hazardous waste surface impoundments. Any potential alternatives would involve the removal of the waste and eventual land disposal at some other site. There appears to be no known alternative projects that would offer more protection to the environment than issuing a post-closure permit for the closed units without unduly curtailing non-environmental benefits.

2. ALTERNATIVE SITE

This draft permit renewal is for an existing facility. The hazardous waste units to be permitted are post-closure units with wastes closed in place. The locations of the post-closure units were determined by the previous location of the operational units that were closed.

3. MITIGATING MEASURES

CITGO Petroleum Corporation has instituted post-closure care requirements for the closed units that are protective of human health and the environment. No mitigating measures would offer more protection to the environment than permitting the existing units without unduly curtailing non-environmental benefits.